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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
THOMAS J. PARDINI IN SUPPORT  
OF PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS MOTION  
FOR RELIEF FROM NON-  
DISPOSITIVE PRETRIAL ORDER OF  
MAGISTRATE JUDGE (DKT. 2473)**

I, Thomas J. Pardini, declare as follows:

1. I am a member of the Bar of the State of California and an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Motion for Relief from Non-Dispositive Pretrial Order of Magistrate Judge (Dkt. 2473).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibits 3, 4, and 5	Red Boxes

3. The red boxes in Exhibits 3, 4, and 5 to Waymo's Motion contain the email addresses of current and former company employees, whose electronic communications may become compromised if this information were disclosed to the public. Defendants seek to seal this information in order to protect the privacy of these individuals because this lawsuit is currently the subject of extensive media coverage. I understand that disclosure of this information could expose these individuals to harm or harassment.

4. Defendants' request to seal is narrowly tailored to the portions of Waymo's Motion and supporting exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of January, 2017 at San Francisco, California.

/s/ Thomas J. Pardini  
Thomas J. Pardini